

DECLARATION OF JOSEPH M. FISHER

EXHIBIT A

U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

If You Bought a Cathode Ray Tube (CRT) or a TV or Computer Monitor That Contained a CRT

You Could Get Money from Settlements Totaling \$576.75 Million.

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- Please read this notice carefully. Your legal rights may be affected whether or not you act.
- This is the third legal notice in this case. There are now nine Settlements in this litigation involving alleged overcharges on the price of Cathode Ray Tube (“CRT”) Products purchased indirectly from the Defendants. “CRT Products” include CRTs and products containing CRTs, such as televisions and computer monitors. “Indirectly” means that you purchased the CRT Product from someone other than a Defendant or alleged co-conspirator. For example, you bought a television containing a CRT from a retailer, such as Best Buy or Costco, or a computer monitor containing a CRT from Dell.
- The Court previously approved Settlements with two Defendants, Chunghwa and LG. Settlements have now been reached with seven additional Defendants: Philips, Panasonic, Hitachi, Toshiba, Samsung SDI, Thomson and TDA (“New Settlements”).
- You can make a claim for money if you are a person or business who indirectly purchased CRT Products for your own use and not for resale in Arizona, California, the District of Columbia, Florida, Hawaii, Iowa, Kansas, Maine, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New Mexico, New York, North Carolina, North Dakota, South Dakota, Tennessee, Vermont, West Virginia or Wisconsin (the “Statewide Damages Classes”). The purchase must have been made in one of the foregoing states. But you do not have to be a resident of one of these states.
- The New Settlements also release the injunctive relief claims of consumers of CRT Products nationwide (excluding Illinois, Oregon and Washington) (the Nationwide Class). See Question 7 in this Notice for specific Class definitions.
- Sony Corporation is **not** a defendant and is **not** alleged to have participated in the alleged CRT conspiracy. Purchases of Sony® branded CRT Products are **not** eligible to be included in claims filed under these Settlements.

YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS	
SUBMIT A CLAIM BY DECEMBER 7, 2015	This is the only way to receive a payment. See Question 11.
OBJECT BY OCTOBER 8, 2015	You can file an objection with the Court (and mail a copy to the Settlement Administrator) explaining why you disagree with the New Settlements, the plan of distribution, the requested attorneys’ fees and litigation expenses, and/or the Class Representative awards. See Question 17 for specifics.
GO TO THE HEARING ON NOVEMBER 13, 2015	Ask to speak in Court about the Settlements. See Questions 18 and 20.
EXCLUDE YOURSELF BY OCTOBER 8, 2015	The only option that allows you to individually sue Philips, Panasonic, Hitachi, Toshiba, Samsung SDI, Thomson or TDA about the claims in this case. See Questions 12 and 13 for specifics.
DO NOTHING	You will not receive a payment from the Settlements and you will give up any rights you currently have to separately sue Defendants for the conduct that is the subject of the lawsuits.

These rights and options – **and the deadlines to exercise them** – are explained in this Notice.

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BASIC INFORMATION

1. What is this Notice about?

This Notice is to inform you about the seven New Settlements that have been reached which may affect your rights, including your right to file a claim, object to, or exclude yourself from the New Settlements. You have the right to know about the New Settlements and about your legal rights and options before the Court decides whether to approve the New Settlements.

Members of the Statewide Damages Class are eligible to file a claim now to get a payment from all nine Settlements (see Question 11).

The Court in charge is the United States District Court for the Northern District of California. The case is called *In re: Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917. The people and businesses that sued are called the Plaintiffs, and the companies they sued are called the Defendants (see Question 6).

2. What is a Cathode Ray Tube (“CRT”)?

Cathode Ray Tubes (“CRTs”) are a display technology that was widely used in televisions and computer monitors. Before LCD, Plasma and LED display technologies became popular, CRTs were the main technology used in displays. There are two main types of CRTs: Color Display Tubes (“CDTs” or “Monitor Tubes”), which were used to manufacture computer monitors, and Color Picture Tubes (“CPTs” or “TV Tubes”), which were used to manufacture televisions. This is what a CRT looks like:



3. What is a CRT Product?

For the purposes of the lawsuit and the Settlements, CRT Products means Cathode Ray Tubes (color display tubes, color picture tubes and monochrome display tubes) and products containing Cathode Ray Tubes, such as televisions and computer monitors. This is what a CRT Product looks like:

CRT Monitor:



CRT Television:



4. What is the lawsuit about?

The lawsuit claims that the Defendants fixed the prices of CRTs from March 1, 1995 to November 25, 2007, which resulted in overcharges to people and businesses that bought CRTs and products containing CRTs, such as televisions and computer monitors. The Defendants deny these claims. The Court has not decided who is right.

On March 22, 2012, the Court approved a Settlement totaling \$10,000,000 with Defendant Chunghwa. On April 18, 2014, the Court approved a Settlement totaling \$25,000,000 with Defendant LG. There are now seven New Settlements totaling \$541,750,000 with the Philips, Panasonic, Hitachi, Toshiba, Samsung SDI, Thomson and TDA Defendants. The Court still has to decide whether to approve the New Settlements. The total amount of all nine Settlements is \$576,750,000.

5. What is a class action?

In a class action, one or more persons or businesses called class representatives sue on behalf of a group or a “class” of others with similar claims. If the Court determines that a case should proceed as a class action, everyone’s claims can be combined into a single proceeding, creating efficiencies for the parties and the courts. In a class action, the court resolves the issues for all class members except those who exclude themselves from the Class.

WHO IS INCLUDED IN THE LAWSUIT?

6. Who are the Defendant companies?

The Defendants are manufacturers and/or sellers of CRTs.

The Defendant companies are:

- Chunghwa Picture Tubes Ltd.; Chunghwa Picture Tubes (Malaysia) SDN. BHD (“Chunghwa”);
- LG Electronics Inc.; LG Electronics USA, Inc.; LG Electronics Taiwan Taipei Co., Ltd. (“LG”);
- Koninklijke Philips N.V. (f/k/a Koninklijke Philips Electronics N.V.); Philips Electronics North America Corporation; Philips Taiwan Limited (f/k/a Philips Electronics Industries (Taiwan), Ltd.); Philips do Brasil, Ltda. (f/k/a Philips da Amazonia Industria Electronica Ltda.) (“Philips”);
- Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.); Panasonic Corporation of North America; MT Picture Display Co., Ltd.; and an affiliate of Panasonic Corporation, Beijing Matsushita Color CRT Co., Ltd. (collectively “Panasonic”);
- Hitachi, Ltd.; Hitachi Displays, Ltd. (n/k/a Japan Display Inc.); Hitachi Electronic Devices (USA), Inc.; Hitachi Asia, Ltd.; Hitachi America, Ltd. (“Hitachi”);
- Toshiba Corporation; Toshiba America Information Systems, Inc.; Toshiba America Consumer Products, L.L.C.; Toshiba America Electronic Components, Inc. (“Toshiba”);
- Samsung SDI Co. Ltd; Samsung SDI America, Inc.; Samsung SDI Brasil, Ltda.; Tianjin Samsung SDI Co., Ltd.; Shenzhen Samsung SDI Co., Ltd; Samsung SDI Malaysia Sdn. Bhd; Samsung SDI Mexico S.A. de C.V. (“Samsung SDI”);
- Technicolor SA (f/k/a Thomson SA); Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.) (“Thomson”); and
- Technologies Displays Americas LLC (f/k/a Thomson Americas LLC) (“TDA”).

There are several other manufacturers and sellers of CRTs that Plaintiffs allege were a part of the alleged conspiracy but who are not currently defendants or have not appeared in the litigation. The names of these companies are:

- LG.Philips Displays, a/k/a LP Displays International, Ltd.;
- IRICO Group Corporation; IRICO Display Devices Co., Ltd.; and IRICO Group Electronics Co., Ltd.;
- Thai CRT Company, Ltd.;
- Samtel Color, Ltd.;
- Orion Electric Company, Ltd.;
- Videocon Industries, Ltd.; and

- Mitsubishi Electric Corporation; Mitsubishi Electric & Electronics USA, Inc.; and Mitsubishi Digital Electronics Americas, Inc.

7. How do I know if I am in the Settlement Class?

The Settlements have recovered money (“damages”) for consumers who purchased CRT Products in 21 states and the District of Columbia (the “Statewide Damages Classes”). These states and the District of Columbia have antitrust and/or consumer protection laws permitting consumers to sue for damages for antitrust violations.

The Settlements also release the injunctive relief claims of consumers of CRT Products nationwide (excluding Illinois, Oregon and Washington) (the “Nationwide Class”).

The “Settlement Class” includes:

Statewide Damages Classes:

The Statewide Damages Classes include any person or business entity in Arizona, California, District of Columbia, Florida, Hawaii, Iowa, Kansas, Maine, Michigan, Minnesota, Mississippi, Nebraska, Nevada, New Mexico, New York, North Carolina, North Dakota, South Dakota, Tennessee, Vermont, West Virginia, and Wisconsin that indirectly purchased for their own use and not for resale a CRT Product manufactured or sold by any of the Defendants or their alleged co-conspirators (listed in Question 6).

The purchase must have been made in one of the foregoing states. But you do not have to be a resident of one of these states.

Class Period: In order to bring a claim, you must have purchased the CRT Product(s) between March 1, 1995 and November 25, 2007. Because the Hawaii, Nebraska and Nevada laws allowing consumers to bring a claim were enacted after the beginning of the class period, those states have slightly shorter class periods.

- Purchases of CRT Products in Hawaii must have been made between June 25, 2002 and November 25, 2007.
- Purchases of CRT Products in Nebraska must have been made between July 20, 2002 and November 25, 2007.
- Purchases of CRT Products in Nevada must have been made between February 4, 1999 and November 25, 2007.

Nationwide Class: The Nationwide Class includes any person or business that, during the period from March 1, 1995 and November 25, 2007, indirectly purchased in the United States (excluding Illinois, Oregon and Washington) for their own use and not for resale, a CRT Product manufactured or sold by any of the Defendants or their co-conspirators (listed in Question 6).

Exclusions:

- Specifically excluded from the Statewide Damages Classes and the Nationwide Class are the Defendants; the officers, directors or employees of any Defendant; any entity in which any Defendant has a controlling interest; and, any affiliate, legal representative, heir or assign of any Defendant.
- Also excluded are named co-conspirators, any federal, state or local government entities, any judicial officer presiding over this action and members of his/her immediate family and judicial staff, and any juror assigned to this action.
- Sony Corporation is not a defendant and purchases of Sony® branded CRT Products are excluded from the Settlements.
- Residents of Illinois, Oregon and Washington are excluded from the Nationwide Class because the Attorneys General of those states are suing the Defendants on behalf of residents of those states.

The specific class definitions are available at www.CRTclaims.com.

THE SETTLEMENTS' BENEFITS

8. What do the Settlements provide?

The Court has already approved two settlements totaling \$35,000,000. The seven New Settlements totaling \$541,750,000 are being presented to the Court for approval.

NEW SETTLEMENTS

<u>Philips Settlement:</u>	Philips has paid \$175,000,000 into the Settlement Fund
<u>Panasonic Settlement:</u>	Panasonic has paid \$70,000,000 into the Settlement Fund
<u>Hitachi Settlement:</u>	Hitachi has paid \$28,000,000 into the Settlement Fund
<u>Toshiba Settlement:</u>	Toshiba has paid \$30,000,000 into the Settlement Fund
<u>Samsung SDI Settlement:</u>	Samsung SDI has paid \$225,000,000 into the Settlement Fund
<u>Thomson and TDA Settlements:</u>	Thomson and TDA have paid \$13,750,000 into the Settlement Fund

The combined Settlement Fund totaling \$576,750,000 will be used to pay eligible claimants in the states involved in this litigation. Any interest earned will be added to the Settlement Fund. The cost to administer the Settlements as well as attorneys' fees, litigation expenses and payments to the Class Representatives will come out of the combined Settlement Fund (*see Question 16*).

The Settlement Agreements and the papers filed in support of the New Settlements are available for review and download at www.CRTclaims.com, or you can request copies by calling the Settlement Administrator at 1-800-649-0963.

9. How much money can I get?

Only members of the Statewide Damages Classes are eligible to receive a payment from the Settlement Fund. A plan has been submitted to the Court explaining how the Settlement Fund will be distributed to the Statewide Damages Class Members. Payments will be determined on a pro rata basis. This means that payment amounts will be based on the number of valid claims filed, as well as on the number and type of CRT Product(s) purchased: Standard CRT Television (screen size of less than 30 inches); Large CRT Television (screen size of 30 inches or larger); or CRT Computer Monitor. Based on data obtained during the course of the litigation, claims for different types of CRT Products will be weighted as follows:

- Claims for purchases of Standard CRT Televisions will be weighted as 1;
- Claims for purchases of Large CRT Televisions will be weighted as 4.3; and
- Claims for purchases of CRT Computer Monitors will be weighted as 3.

At this time, it is unknown how much money each Class Member will recover. It is expected that a minimum payment of \$25 will be made to all Statewide Damages Class Members who submit a valid claim. The maximum payment will be three times the estimated money damages for each claimant.

More details about the anticipated distribution of the Settlement Fund are available in the papers filed with the Court in support of settlement approval, which are available on the settlement website, www.CRTclaims.com.

In order to receive a payment you need to file a valid claim (*see* Question 11). The Claim Form provides additional details on how to submit a claim. Further information is available at www.CRTclaims.com or by calling the Settlement Administrator at 1-800-649-0963.

10. When will I get a payment?

Payments will be distributed after the Court grants final approval to the New Settlements and after any appeals are resolved. If the Court approves the New Settlements after the hearing on **November 13, 2015**, there may be appeals. We don't know how much time it could take to resolve any appeals that may be filed.

How to GET A PAYMENT

11. How can I get a payment?

If you are a member of the Statewide Damages Classes and you want to make a claim from the Settlement Fund, you must complete and submit a Claim Form. We urge you to submit a claim online at www.CRTclaims.com. If you do not file online, you can also submit a claim by mail.

The Claim Form can be found and completed or downloaded at www.CRTclaims.com, or you can obtain a copy by calling the Settlement Administrator toll free at 1-800-649-0963, or by texting "CRTclaims" to 97000. If you choose to submit your claim online, you must do so on or before **December 7, 2015**. If you choose to submit a Claim Form by mail, it must be postmarked by **December 7, 2015**, and mailed to:

CRT Claims
c/o The Notice Company
P.O. Box 778
Hingham, MA 02043

RIGHT TO EXCLUDE YOURSELF

12. Who has a right to be excluded?

If you are a Settlement Class Member and you wish to keep your right to sue Philips, Panasonic, Hitachi, Toshiba, Samsung SDI, Thomson and/or TDA about the claims alleged and settled in this case (*see* Questions 4 and 7), you must exclude yourself. You will not get any money from these Settlements if you exclude yourself. You may not submit a Claim Form if you exclude yourself from the Settlement.

13. How do I exclude myself from the Settlement Class?

If you choose to exclude yourself from the Settlement Class and keep your right to sue Defendants on your own, you must send a letter that includes the following:

- Your name, address and telephone number;
- A statement saying that you request exclusion from the Settlement Class and do not wish to participate in the settlements in In re Cathode Ray Tubes (CRT) Antitrust Litigation, MDL No. 1917; and
- Your signature.

You must mail your exclusion request, postmarked no later than **October 8, 2015**, to:

CRT Indirect Exclusions
c/o The Notice Company
P.O. Box 778
Hingham, MA 02043

REMAINING IN THE SETTLEMENT CLASS

14. What am I giving up if I stay in the Settlement Class?

If you do not exclude yourself from the Settlement Class, you will have given up your right to sue Philips, Panasonic, Hitachi, Toshiba, Samsung SDI, Thomson and TDA on your own for the claims alleged and settled in this case (*see* Questions 4 and 7) and will be bound by the settlement and all subsequent proceedings, orders and judgments in the lawsuit. In return for paying the Settlement Amounts (*see* Question 8), the seven Settling Defendants (and certain related entities defined in the Settlement Agreements) will be released from all claims relating to the facts underlying these lawsuits, as more fully described in the Settlement Agreements.

The Settlement Agreements describe the released claims in detail, so read them carefully since those Agreements are binding on you. If you have any questions, you may call the toll-free number and speak to the Settlement Administrator for free. You may also consult your own lawyer at your own expense. The Settlement Agreements and the specific releases are available at www.CRTclaims.com.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer representing me?

The Court has appointed Trump, Alioto, Trump & Prescott LLP, 2280 Union Street, San Francisco, CA 94123, to represent you as “Class Counsel” for the Settlement Class. You do not have to pay Class Counsel separately. The attorneys will seek compensation by asking the Court for a share of the settlement proceeds. If you want to be represented by your own lawyer, and have that lawyer appear in court for you in this case, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel will ask the Court for attorneys’ fees and reimbursement of expenses on behalf of all Plaintiffs’ counsel who worked on this case. The total attorney fee request for all Plaintiffs’ counsel shall not exceed one-third of the combined Settlement Fund of \$576,750,000. Class Counsel will also request awards to the Class Representatives who helped the attorneys on behalf of the Classes. Any payment to the attorneys will be subject to Court approval, the attorneys may request less than one-third of the Settlement Fund and the Court may award less than the requested amount. Any award of attorneys’ fees, litigation expenses and awards that the Court orders, plus the costs to administer the Settlements, will come out of the Settlement Fund and is subject to Court approval.

The attorneys’ motion for fees, litigation expenses and Class Representative awards will be filed on or before **September 23, 2015**. The motion will be posted on the website at www.CRTclaims.com. You may register at the website or by calling the Settlement Administrator at 1-800-649-0963 to receive an email when the motion(s) are filed.

**OBJECTING TO OR COMMENTING ON THE NEW SETTLEMENTS,
PLAN OF DISTRIBUTION, ATTORNEYS' FEES AND LITIGATION EXPENSES,
AND AWARDS TO CLASS REPRESENTATIVES**

17. How do I object or comment on the Settlements?

You can ask the Court to deny approval by filing an objection to the New Settlements. You can't ask the Court to order a larger settlement; the Court can only approve or deny the Settlements. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

You may object to the New Settlements in writing. The written objection needs to include the following information:

- Your name, address, telephone number, and if you are being assisted by a lawyer, their name, address and telephone number;
- The case name and number (In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917);
- Proof of membership in the class;
- A brief explanation of your reasons for objecting; and
- Your signature.

The objection must be submitted to the Court either by mailing it to the Class Action Clerk at the address below, or by filing it in person at any location of the United States District Court for the Northern District of California. **The objection must be filed with the Court or postmarked on or before October 8, 2015:**

COURT
Class Action Clerk United States District Court for the Northern District of California 450 Golden Gate Avenue, 16th Floor San Francisco, CA 94102

THE FAIRNESS HEARING

18. When and where will the Court consider the New Settlements, the plan of distribution, request for attorneys' fees and litigation expenses, and awards to Class Representatives?

The Court previously approved the two original settlements with Chunghwa and LG. The Court will hold a Fairness Hearing to consider the New Settlements at **10:00 a.m. on November 13, 2015**, at the United States District Court for the Northern District of California, Courtroom One, 17th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102. The hearing may be moved to a different date or time without additional notice, so you should check the website www.CRTclaims.com for current information.

At this hearing the Court will consider whether each of the New Settlements is fair, reasonable and adequate. The Court will also consider the plan of distribution, and the requests for attorneys' fees, litigation expenses and awards to Class Representatives. If there are objections or comments, the Court will consider them at this time. After the hearing, the Court will decide whether to approve each of the seven New Settlements, the plan of distribution and the requests for attorneys' fees, litigation expenses and awards to Class Representatives. We do not know how long these decisions will take.

19. Do I have to come to the hearing?

No. Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you file an objection or comment, you don't have to come to Court to talk about it. As long as you filed your written objection on time, your objection will be presented to the Court for its consideration. You may also pay another lawyer to attend on your behalf, but it's not required.

20. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must file a "Notice of Intent to Appear in In re Cathode Ray Tube (CRT) Antitrust Litigation, MDL No. 1917." Be sure to include your name, address, telephone number and your signature. Your Notice of Intent to Appear must be submitted to the Court either by mailing it to the Class Action Clerk at the address in Question 17, or by filing it in person at any location of the United States District Court for the Northern District of California no later than **October 8, 2015**. You cannot speak at the hearing if you excluded yourself from the Settlement Class.

GET MORE INFORMATION

21. Where can I get more information?

This notice summarizes the seven New Settlements. For the precise terms and conditions of the Settlements, please see the Settlement Agreements available at www.CRTclaims.com. You can also get more information about the Settlements by:

- Calling the Settlement Administrator at 1-800-649-0963;
- Texting "CRTclaims" to 97000;
- Writing to CRT Questions, c/o The Notice Company, P.O. Box 778, Hingham, MA 02043;
- Accessing the Court docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>; or
- Visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**ALL INQUIRIES CONCERNING THIS NOTICE
SHOULD BE MADE TO THE SETTLEMENT ADMINISTRATOR**

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE